

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

The Staff of the Missouri Public Service Commission,	)	
	)	
	)	
Complainant,	)	
	)	
v.	)	<u>Case No. WC-2008-0030</u>
	)	
Suburban Water and Sewer Co. and Gordon Burnam,	)	
	)	
	)	
Respondents.	)	

**STAFF MOTION FOR PREHEARING CONFERENCE, TO ESTABLISH A  
PROCEDURAL SCHEDULE, AND SET DATES FOR EVIDENTIARY HEARING**

COMES NOW, The Staff of the Public Service Commission, by attorney, states that although there has been significant progress in this case, several issues remain unresolved that may affect Suburban's ability to provide safe and adequate water service to its customers. For that reason, the Staff moves the Commission to set a prehearing conference in this matter.

In addition, the Staff requests the Commission to establish a procedural schedule in this matter and set dates for evidentiary hearing. The following issues remain for Commission determination:

1. The inlet in the standpipe has not been moved to a height sufficient to allow adequate chlorination of water before distribution;
2. The status of the standpipe and its viability to continue in service is in question; the condition of the standpipe appears to be such that it threatens Suburban's ability to continue safe and adequate service;

3. Suburban has not provided sufficient meter reading information to determine whether there remain leaks in the system that may threaten Suburban's ability to provide safe and adequate service;
4. Suburban has not provided sufficient information to the Staff regarding the duties, responsibilities, and resources available to the water operator at Suburban to determine whether the operator will be able to ensure that safe and adequate water service can be rendered;
5. The Staff is concerned that Suburban is not maintaining plant property and operations records sufficient to assess the efficiency and adequacy of the operation of the system or provide sufficient information for an audit in any upcoming rate case.

Wherefore, the Staff moves the Commission for an order setting a prehearing conference and evidentiary hearing.

Respectfully submitted,

**/s/ Steven C. Reed**

Steven C. Reed

Missouri Bar No. 40616

Attorney for the Staff of the  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102  
(573) 751-3015 (Telephone)  
(573) 751-9285 (Fax)

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing motion were delivered by first class mail postage prepaid, and electronic mail, to Tom Harrison, Attorney for Suburban Water and Sewer Co. and Gordon Burnam, and via electronic mail to Christina Baker, Office of the Public Counsel, at [Christina.Baker@ded.mo.gov](mailto:Christina.Baker@ded.mo.gov) on this 13<sup>th</sup> day of November, 2007.

/s/ Steven C. Reed